

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:) Chapter 11
Stream TV Networks, Inc., et al.) Bankruptcy No. 23-10763 (DJB)
Debtors.)
William A. Homony, in his Capacity as Chapter 11 Trustee of the Bankruptcy Estates of Stream TV Networks, Inc. and Technovative Media, Inc. Plaintiff) v. Rembrandt 3D Holding Ltd., Visual Semiconductor, Inc., Mathu Rajan, Raja Rajan, and Brown and Michaels, P.C., Defendants.)

**[PROPOSED] ORDER GRANTING DEFENDANT'S MOTION TO COMPEL DISCOVERY
RELATING TO MOTION FOR SANCTIONS PURSUANT TO
BANKRUPTCY RULE 9011, FRCP 11, 28 U.S.C. § 1927, AND THE COURT'S
INHERENT AUTHORITY**

Upon consideration of the Motion to Compel Discovery filed by Defendant Raja Rajan, and any opposition filed by Plaintiff Homony, and after due deliberation and for good cause shown, the Court hereby finds and orders as follows:

1. The discovery requests served by Defendant Raja Rajan on May 2, 2025 are relevant to Defendant's Motion for Sanctions, and are not premature under the Federal Rules of Bankruptcy Procedure.
2. Plaintiff's refusal to respond to discovery was without substantial justification, and the objections asserted on the basis of prematurity are overruled.
3. **IT IS HEREBY ORDERED** that:
 - a. Plaintiff shall serve **full and complete responses**, without objection (except for bona fide privilege claims), to:
 - o Defendant's First Set of Interrogatories
 - o Defendant's First Set of Requests for Admission
 - o Defendant's First Set of Requests for Production of Documents within seven (7) days of the entry of this Order.

- b. If Plaintiff withholds any document or information on the basis of privilege, a privilege log complying with Rule 26(b)(5) shall be produced with the responses.
 - c. Defendant Raja Rajan is awarded reasonable attorneys' fees and costs incurred in bringing the Motion to Compel, pursuant to Federal Rule of Civil Procedure 37(a)(5)(A), as incorporated by Bankruptcy Rule 7037. Defendant Raja Rajan shall file a declaration of fees and costs within 14 days of this Order.
4. The Court reserves jurisdiction to address any further discovery disputes or motions related to the enforcement of this Order.

IT IS SO ORDERED.

Dated: _____

United States Bankruptcy Judge